

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

**UNITED STATES OF AMERICA VS. PAUL GEER**

**EXHIBIT LIST**

CASE NO. 3:24-CR-0170

DATE: February 19, 2025

PRESIDING JUDGE: Hon. Mae D'Agostino

(    ) PLAINTIFF      ( X ) DEFENDANT

EXHIBIT NUMBER	DATE MARKED FOR ID	DATE ADMITTED IN EVIDENCE	WITNESS	EXHIBIT DESCRIPTION
D 1				Family Foundation School Curriculum dated May 3, 1999
D 2				September 8, 2010 letter to Emmanuel Argiros from the NYS Commission on Quality of Care & Advocacy
D 3				The Family Singers cassette tape
D 4				Photograph - family at Christmas
D 5				Photograph - Paul Geer playing the piano
D 6				Photograph - Paul Geer tubing
D 7				Photograph - Paul Geer in recording studio
D 8				Photograph - Paul Geer in the classroom (B&W 1)
D 9				Photograph - Paul Geer in the classroom (B&W 2)



D 10				Photograph - group in recording studio
D 11				Photograph - Paul Geer in recording studio
D 12				Photograph - D.C. competition
D 13				Photograph – Paul Geer in gray suit (1)
D 14				Photograph – Paul Geer in gray suit (2) – group photo
D 15				Photograph – Christine Speicher large group photo
D 16				Photograph – Christine Speicher small group photo
D 17				Photograph – Christine Speicher trio
D 18				Photograph – Susan Runge
D 19				Photograph – Susan Runge group photo with Tony & Betty
D 20				Photograph – Ted Towsley – Toronto 2000
D 21				Photograph – Ted Towsley – Rye Playland 1993 (1)
D 22				Photograph – Ted Towsley – Rye Playland 1993 (2)
D 23				Photograph – Ted Towsley – Rye Playland 1993 (3)
D 24				Photograph – Ted Towsley – Barn Ball
D 25				Photograph – Ted Towsley– Toronto 2000
D 26				Photograph – Ted Towsley– group photo in front of bus
D 27				Photograph – School Building (1)
D 28				Photograph – School Building (2)
D 29				Photograph – School Building (3)
D 30				Photograph – Audra Towsley – pond/dock (1)
D 31				Photograph – Audra Towsley – pond/dock (2)
D 32				Photograph – Audra and Ted Towsley
D 33				Photograph – large group women’s choir



D 34				Photograph - beach
D 35				Photograph - eating
D 36				Photograph – theater group photo (1)
D 37				Photograph – theater group photo (2)
D 38				Photograph – Susan Runge - picnic
D 39				Photograph – Audra Towsley- amusement park
D 40				Photograph – group photo of women’s choir (1)
D 41				Photograph – group photo of women’s choir (2)
D 42				Photograph – Ted Towsley with students
D 43				Photograph – boys goofing around – Toronto 2000
D 44				Photograph – Christine Speicher - picnic
D 45				Photograph – two girls on bus
D 46				Photograph – Meghan Clarke – outside with friend
D 47				Photograph – Meghan Clarke – graduation with man
D 48				Photograph – Meghan Clarke – parking lot
D 49				Photograph – Meghan Clarke
D 50				Photograph – Meghan Clarke
D 51				Photograph – Meghan Clarke – group photo
D 52				Photograph – Meghan Clarke – couch
D 53				Photograph – Meghan Clarke – graduation
D 54				Photograph – Meghan Clarke – Father Stephen Morris (1)
D 55				Photograph – Meghan Clarke – Father Stephen Morris (2)
D 56				Photograph – Meghan Clarke – graduation
D 57				Photograph – Meghan Clarke – trio



D 58				Photograph – Jenna Mutnick – porch
D 59				Photograph – Jenna Mutnick – bear
D 60				Photograph – Jenna Mutnick – trio sitting on rock
D 61				Photograph – Jenna Mutnick – sitting with friend
D 62				Photograph – Jenna Mutnick – white shirt
D 63				Photograph – Jenna Mutnick – choir group photo
D 64				Photograph – Jenna Mutnick – sitting on couch with friend
D 65				June 10, 2005 letter to Paul Geer from North American Music Festivals
D 66				2012 HOBY World Leadership Congress certificate presented to Paul Geer
D 67				2013 HOBY World Leadership Congress certificate presented to Paul Geer
D 68				Text message screenshots between Paul Geer and Ben Misanin
D 69				Photograph – Susan Runge with students at Niagara Falls
D 70				Video of baby grand piano
D 71				Video of boot closet
D 72				Video of gym showing imprint of piano box
D 73				Video of hallways common area
D 74				Video of ramp to backstage
D 75				Video of stairway going down
D 76				Video of stairway going up
D 77				Video of upstairs music room

EXHIBITS RETURNED TO COUNSEL (DATE): \_\_\_\_\_

SIGNATURE: \_\_\_\_\_